

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

KARMO TAMANG,)
Plaintiff)
)
v.) Case No. 1:17cv370 (GBL/MSN)
)
KALPANA MEHRA, et al.)
Defendant)

DEFENDANTS' MOTION TO DISMISS UNDER Fed. R. Civ. P. 12(b)(6)

Come now Defendants Kalpana Mehra and Vandana Nandwani, by counsel, and hereby respectfully move to dismiss the Amended Complaint in this matter pursuant to Fed. R. Civ. P. 12(b)(6) for the reasons set forth in the attached memorandum.

Respectfully submitted,
Kalpana Mehra
Vandana Nandwani
By Counsel

/s/
Christopher M. Day
Virginia State Bar No. 39490
Attorney for Kalpana Mehra and Vandana Nandwani
Juris Day, PLLC
10521 Judicial Drive, Suite 200
Fairfax, Virginia 22030
Phone: 703.268.5600
Facsimile: 703.268.5602
cmday@jurisday.com

Jonathan A. Nelson
Virginia State Bar No. 75247
Attorney for Kalpana Mehra and Vandana Nandwani
Juris Day, PLLC
10521 Judicial Drive, Suite 200
Fairfax, Virginia 22030
Phone: 703.268.5600

Facsimile: 703.268.5602
jnelson@jurisday.com

Certificate of Service

I hereby certify that on this 31st day of July, 2017, I will electronically file the foregoing with the Clerk of Court using the Court's CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Christine Dinan, VSB # 84556
Matthew K. Handley, Esq., Pro Hac Vice
Attorneys for Karmo Tamang
Washington Lawyers' Committee for
Civil Rights and Urban Affairs
11 Dupont Circle N.W., Suite 400
Washington, DC 20036
Christine_dinan@washlaw.org

/s/
Christopher M. Day
Virginia State Bar No. 39490
Attorney for Kalpana Mehra and Vandana Nandwani
Juris Day, PLLC
10521 Judicial Drive, Suite 200
Fairfax, Virginia 22030
Phone: 703.268.5600
Facsimile: 703.268.5602
cmday@jurisday.com

Jonathan A. Nelson
Virginia State Bar No. 75247
Attorney for Kalpana Mehra and Vandana Nandwani
Juris Day, PLLC
10521 Judicial Drive, Suite 200
Fairfax, Virginia 22030
Phone: 703.268.5600
Facsimile: 703.268.5602
jnelson@jurisday.com